

From: [Guerry, William M.](#)
To: [HertzWu, Sara](#)
Cc: [Bill Tyndall](#); [Ted Sommer](#); [Mike Major](#); [Desiree McCaslen](#); RErnest@bigoxenergy.com; [Sahu, Dr. Ranajit R.](#); josebahr@bigoxenergy.com; [Hensley, Dave](#); [Terriquez, Joe](#); [Queiroz, Gustavo](#)
Subject: Re: Conf Call on Friday/Monday on AD #2 Roof Repairs
Date: Wednesday, October 31, 2018 2:16:31 PM

Sara. Thanks for your email.

I suggest some time on Friday between 9 and 1 Central Time. Best, Bill

Sent from my iPhone

On Oct 31, 2018, at 2:31 PM, HertzWu, Sara <HertzWu.Sara@epa.gov> wrote:

We would prefer Friday. What times do you propose?

From: Guerry, William M. <WGuerry@KelleyDrye.com>
Sent: Wednesday, October 31, 2018 12:40 PM
To: HertzWu, Sara <HertzWu.Sara@epa.gov>
Cc: Bill Tyndall <btyndall@netleasecapital.com>; 'Ted Sommer' <TSommer@BOETeams.com>; Mike Major <mmajor@powerfulcompliance.com>; Desiree McCaslen <DMcCaslen@bigoxenergy.com>; RErnest@bigoxenergy.com; Sahu, Dr. Ranajit R. <RSahu@KelleyDrye.com>; 'josebahr@bigoxenergy.com' <josebahr@bigoxenergy.com>
Subject: Conf Call on Friday/Monday on AD #2 Roof Repairs

Sara

Per my voicemail today--can we set up a call this Friday or on Monday --so that the BOE team can brief you and the EPA team and answer any questions-- on the safety procedures and monitoring as well as the plans for repairing the leaks from the AD #2 Roof?

I plan to send you tomorrow BOE's proposed plans and safety procedures. BOE and its subcontractors plan on implementing the AD #2 roof repair starting next Wednesday.
Best, Bill

WILLIAM GUERRY
Partner

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From: Guerry, William M.
Sent: Tuesday, October 30, 2018 1:12 PM
To: HertzWu, Sara <HertzWu.Sara@epa.gov>

Cc: Terriquez, Joe <terriquez.joe@epa.gov>; 'Hensley.Dave@epa.gov' <Hensley.Dave@epa.gov>; 'queiroz.gustavo@epa.gov' <queiroz.gustavo@epa.gov>; Bill Tyndall <btyndall@netleasecapital.com>; Mike Major <mmajor@powerfulcompliance.com>; 'Ted Sommer' <TSommer@BOETeams.com>; Rob Ernest (RErnest@bigoxenergy.com) <RErnest@bigoxenergy.com>; Sahu, Dr. Ranajit R. <RSahu@KelleyDrye.com>
Subject: Completion of Repair to Mixer #2 Seal

Sara,

Per our call last week, enclosed is the summary you requested:

On October 3rd, BOE successfully and safely completed the repairs to seal the prior leaks from Mixer #2 without any problems. Per the BOE plan, BOE and its contractor staff reduced the digester's operating pressure to minimize release during the repair and to set the flare operating thresholds to maintain active flaring at the reduced pressures.

When the Mixer #2 sealing-enclosure was lifted, staff learned that recent operational improvements allowed the Mixer #2 draft-tube to relax and re-center itself in its placement hole.

BOE and its contractor staff completed the service in one day and did not have to install roof rigging or other trusses to remove Mixer 2. BOE staff placed a flange gasket and cover over the remaining perforation and verified a hermetic seal with handheld monitors (*see enclosed photo*). During the repair of the Mixer, BOE used this handheld monitoring unit as an additional device, primarily to ensure safe tank-entry. Based on that monitor's collected data, the methane was only detected at LEL levels within 2 inches of the Mixer's open port. At less than 12 inches, no detectible level of methane was noted. At 15-20 inches, the H₂S level was below 1 ppm. (Dr. Sahu is travelling, but will submit later today the regular monitoring data from the standard Monitoring Units from the last week).

During the Mixer #2 service, BOE staff also replaced a vulnerable gasket on the gas cleanup ski dryer system and also verified the seal's effectiveness.

Pursuant to the AOC, the Release Point Summary Report (attached) has been updated to reflect last week's accomplishments.

Please let me know if you have any questions or concerns.

Best,
Bill

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